

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:  PGX HOLDINGS, INC., <i>et al.</i> ,  Debtors. <sup>1</sup>	Chapter 11  Case No. 23-10718 (CTG)  (Jointly Administered)
KIRSTEN HANSEN on behalf of herself and all others similarly situated,  Plaintiff,  v.  PGX HOLDINGS, INC.; PROGEXION HOLDINGS, INC.; PROGEXION TELESERVICES, INC.; PROGEXION MARKETING, INC.; PROGEXION ASG, INC.; PROGEXION IP, INC.; EFOLKS, LLC; CREDITREPAIR.COM, INC.; CREDIT.COM, INC.; and JOHN C. HEATH, ATTORNEY AT LAW PC,  Defendants.	Adv. Proc. No. 23-50396 (CTG)

**PLAINTIFF’S MOTION FOR CLASS CERTIFICATION AND RELATED RELIEF**

For the reasons stated in the accompanying brief and exhibits thereto, Plaintiff Kirsten Hansen, on behalf of herself and all others similarly situated (the “Plaintiff”), hereby moves the Court, in furtherance of her claims under the Worker Adjustment Retraining and Notification (“WARN”) Act, 29 U.S.C. § 2101 *et seq.* for an Order (a) certifying a class, defined as: Plaintiff and other similarly situated employees of Defendants: (i) who worked at, received assignments from, or reported to the Facilities, (ii) who were terminated without cause within 90 days of April 5, 2023, as the reasonably foreseeable consequence of the mass layoff and/or plant closing ordered

by Defendants on or about April 5, 2023 (iii) who are “affected employees” within the meaning of 29 U.S.C. § 2101(a)(5) and (iv) who have not filed a timely request to opt-out of the class; (b) appointing Raisner Roupinian LLP as Class Counsel, (c) appointing Plaintiff as the Class Representative, (d) approving the form and manner of Notice; and (e) such further relief as this Court may deem proper.

In support of the motion, Plaintiff submits a brief filed herewith and the exhibits thereto: Plaintiff’s supporting declaration (Exh. A), the Declaration of René S. Roupinian (Exh. B), a proposed notice to the class (Exh. C), and proposed order granting the relief sought in the motion (Exh. D).

Dated: August 4, 2023

Respectfully submitted,

By: /s/ Christopher D. Loizides  
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